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18 *Counsel for Defendant Google LLC*

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

21 CHASOM BROWN, WILLIAM BYATT,
22 JEREMY DAVIS, CHRISTOPHER
23 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

24 Plaintiffs,

25 vs.

26 GOOGLE LLC,

27 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

28 **DECLARATION OF VIOLA TREBICKA
IN SUPPORT OF GOOGLE LLC’S
OPPOSITION TO PLAINTIFFS’
SUPPLEMENTAL SANCTIONS BRIEF
PURSUANT TO DKT. 624**

Magistrate Judge: Hon. Susan Van Keulen

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit
4 this declaration in support of Google’s Opposition to Plaintiffs’ Supplemental Sanctions Brief
5 Pursuant to Dkt. 624. I make this declaration of my own personal, firsthand knowledge, and if called
6 and sworn as a witness, I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of Google’s March 1, 2022
8 letter to the Special Master and Plaintiffs.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the April 21,
10 2022 hearing transcript.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document Google
12 produced to Plaintiffs, bearing Bates number GOOG-CABR-00892455.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of a document Google
14 produced to Plaintiffs, bearing Bates number GOOG-CABR-04750983.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the transcript
16 of the June 16, 2021 Rule 30(b)(6) deposition of Google’s corporate designee Glenn Berntson.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript
18 of the February 18, 2022 deposition of ex-Googler employee Rory McClelland.

19 8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from the transcript
20 of the March 23, 2022 deposition of Google employee Steve Ganem.

21 9. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript
22 of the July 18, 2022 deposition of Plaintiffs’ expert Bruce Schneier.

23 10. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the transcript
24 of the July 21, 2022 deposition of Plaintiffs’ expert Jonathan Hochman.

25 11. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the
26 transcript of the November 24, 2021 deposition of Google employee AbdelKarim Mardini.

27 12. Attached hereto as **Exhibit 11** is a true and correct copy of Google’s November 6,
28 2020 Responses and Objections to Plaintiffs’ Request for Admission No. 7.

1 13. Attached hereto as **Exhibit 12** is a true and correct copy of Google's January 20,
2 2022 Responses and Objections to Plaintiffs' Request for Admission No. 47.
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5 I declare under penalty of perjury of the laws of the United States that the foregoing is true
6 and correct. Executed in Los Angeles, California on August 18, 2022.
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9 By /s/ Viola Trebicka
10 Viola Trebicka
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